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June 20, 2023

VIA EMAIL

United States Attorney
Eastern District of New York
271 Cadman Plaza East
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Michael Blume
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Assistant United States Attorneys

Re: *United States v. Rare Breed Triggers, LLC, et al.*
Civil Action No. 1:23-cv-00369-NRM-RML

Dear Counsel:

This firm represents Defendants in the captioned matter. In furtherance of the parties' meet-and-confer on June 8, 2023, and in response to Plaintiff's June 19, 2023 letter, we write to provide information we have learned since June 8 in response to questions raised during the meeting and the June 19 letter.

We provide further information regarding the data collection process undertaken by Defendants:

- As previously stated, we understand that the following Rare Breed Triggers email accounts were forensically collected: dealersales@rarebreedtriggers.com, admin@rarebreedtriggers.com, customerservice@rarebreedtriggers.com. These three accounts are the only email accounts with the @rarebreedtriggers.com domain. This collection resulted in 77,668 documents. The following search terms were applied to this collection, which produced approximately 8,000 documents: ATF letter, ATF approval, Illegal, Legality, Legal, Machinegun, Machine gun, Full auto. The search query for these terms were for exact matches using quotation marks (e.g., "ATF letter"). In addition to the exact search terms, the following searches were performed:
 - ATF letter – also utilized search terms "ATF letters," "A T F letter," and "A T F letters."
 - ATF approval – also utilized search terms "ATF approvals," "A T F approval," and "A T F approvals."
 - Machine gun – also utilized search term "Machine guns,"
 - Machinegun – also utilized a wild card search as "Machinegun*" and search term "Machineguns,"

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- Full auto – also utilized a wild card search as “full auto*” and search term “full autos.”
- Any hard copy documents, or documents stored in hard drives but not email, were searched for by Defendant DeMonico or Defendant Maxwell (see below).
- As previously stated, we understand a self-collection search was made of Defendant Lawrence DeMonico’s Gmail account (lawrence.demonico@gmail.com), with such search based on the following search conditions: Wolf Tactical and AR1 Trigger; Wolf Tactical and US Patent Number 10,514,223; Iberiabank, N.A.; Cole Leleux and RBT or RBF; Kelly Leleux and RBT or RBF; Michael Register and RBT or RBF; Jennifer Pierson and RBT or RBF; Chase Paymentech; JP Morgan Chase; Kevin Maxwell; Rick Vasquez; Rick Vasquez Firearms, LLC; 10,514,223; and any documents to/from RBT or RBF, resulting in 1,956 documents. To the best of his recollection, Mr. DeMonico recalls performing the searches in the following manner:
 - For Wolf Tactical and AR1 Trigger, he would have searched “Wolf Tactical” and “AR1 Trigger”; for Cole Leleux and RBT or RBF, he would have searched to/from Cole Leleux and “Rare Breed Triggers” in addition to to/from Cole Leleux and “RBT” in addition to to/from Cole Leleux and “Rare Breed Firearms” in addition to to/from Cole Leleux and “RBF”
 - We also understand Mr. DeMonico uses one laptop for RBT, and searched the hard drive of that laptop for responsive information. His practice, however, is to email relevant documents that would have been saved on his hard drive, thus the provided emails would include same. Mr. DeMonico also searched for hard copy documents for relevant information and found only the Complaint served on him in this matter.
 - We also are attempting to remedy an issue regarding Mr. DeMonico’s cell phone. Mr. DeMonico attended something of a field day at his children’s elementary school held on May 5, 2023. The majority of the events involved water and Mr. DeMonico’s cell phone got wet. Mr. DeMonico put the phone in the sun in an attempt to dry it out. On May 8, 2023, Mr. DeMonico brought the phone to an AT&T store to have them attempt to restore the phone. The phone appeared to have had both water and heat damage and was unable to be restored. Mr. DeMonico obtained a new phone on May 8, 2023, and only text messages from that date forward are available, none of which are both non-privileged and relevant to this litigation. Nevertheless, in addition to the forensic collection that was completed on the RBT email accounts and self-collections of personal accounts and devices that have been done to date, we are in the process of securing a forensic collection of the cell phone.
- As previously stated, we also understand a search of

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admin@rarebreedfirearms.com for all documents to/from RBT was performed and 37 documents collected.

- We understand a self-collection search was made of Kevin Maxwell's email account (kevin@kmaxwellesq.com), with such search based on the following search conditions: Rare Breed Triggers; Rare Breed Firearms; RBF; RBT; and AR1. These were searched individually without quotes. These were obtained by our firm recently and are still under review.
 - We understand Defendant Maxwell uses one computer and searched his hard drive for documents relevant to this litigation, along with any relevant hard copy paper files, which returned 2602 documents.
 - We also understand that Defendant Maxwell is searching his cell phone for documents relevant to this litigation. Nevertheless, in addition to the forensic collection that was completed on the RBT email accounts and self-collections of personal accounts and devices that have been done to date, we are in the process of securing a forensic collection of the cell phone. As you know, Mr. Maxwell is an attorney with clients with which he communicates via his cell phone, thus the collection will have to take that into account.

[REDACTED]

We provide an additional document production, including documents Bates-numbered RTF_0006072-10015, which can be downloaded here:

[REDACTED] These include customer email. We also plan to provide responses and objections to Plaintiff's discovery demands by the end of the week.

Cole Leleux is available for his deposition on June 30, 2023. Unfortunately, Jennifer Pierson is not. Jennifer Pierson is available, however, the day before, on June 29, 2023. Please let us know if that date works for Ms. Pierson's deposition.

Mr. DeMonico is available for the new deposition date of July 7, but Mr. Maxwell is unavailable on July 10 (or July 7). Mr. Maxwell's July schedule would better accommodate a deposition in that month if he could do it remotely. Please let us know if that is a possibility.

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Very truly yours,

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino
Josiah Contarino

cc: David A. Warrington (via email)
Michael A. Columbo (via email)